

# **Supplemental FTP Requirement**



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**MOBILE6 Workshop**  
**June 29, 1999**

# Documentation



- Proposal not drafted
  
- Proposed methodology outlined in Tier 2 documentation:
  - Koupal, “Development of Light-Duty Emission Inventory Estimates in the Notice of Proposed Rulemaking for Tier 2 and Sulfur Standards”, March 1999 (Appendix C)

# The SFTP Requirement



- Reduces Off-Cycle Emissions
  - Aggressive Driving (US06)
  - Air Conditioning (SC03)
  
- EPA and ARB use same test procedures, different standards
  - EPA standards apply to Tier 1
  - ARB standards apply to LEVs (including NLEVs)

# Federal Phase-In Schedule Under NLEV



<u>Model Year</u>	<u>LDV/T1/T2</u>	<u>LDT3/4</u>
<i>Standards:</i>	<i>ARB</i>	<i>EPA</i>
2001	25%	-
2002	50%	40%
2003	75%	80%
2004	100%	100%

# Tier 1 SFTP Benefits

- EPA rule estimated benefits of Tier 1 SFTP standards, in terms of percent reduction of uncontrolled “excess” emissions:

<u>Pollutant</u>	<u>Off-Cycle</u>	<u>AC</u>
HC	88%	-
CO	72%	-
NOx	78%	50%

# Tier 1 SFTP Proposal



- Reduce uncontrolled off-cycle and air conditioning effects by applicable percentages
- Air Conditioning HC/CO:
  - Account for CO increase due to A/C loading, based on fuel consumption (roughly 20%); assume no additional enrichment
  - HC benefit = 100%
- Applies only to LDT3/4s under NLEV

# LEV SFTP Benefits



- Need to generate percent reductions which can be applied to uncontrolled off-cycle and A/C effects on LEVs.
- Requires comparison of relative stringency of ARB standards for LEVs vs. EPA standards for Tier 1s.

# Determination of LEV SFTP Stringency



- ARB standards apply at 4,000 miles, EPA standards apply at useful life
- ARB SFTP standards projected to 50K using proposed MOBILE6 LEV emission rates
- “Running FTP” standards calculated for LEV and Tier 1 at 50K



# Determination of LEV SFTP Stringency, cont.



- “SFTP stringency” =  $\text{SFTP} / \text{Running FTP}$ ; compared between LEV and Tier 1
- LEV benefits derived by adjusting Tier 1 benefits according to “SFTP stringency”

# LEV Off-Cycle Benefits



	<u>LDV/T1</u>	<u>LDT2</u>	<u>LDT3</u>	<u>LDT4</u>
HC	98%	99%	93%	91%
CO	79%	78%	78%	79%
NOx	97%	98%	87%	84%

# LEV A/C Benefits



	<u>LDV/T1</u>	<u>LDT2</u>	<u>LDT3</u>	<u>LDT4</u>
HC	100%	100%	100%	100%
CO	-	-	-	-
NOx	79%	93%	90%	90%

# LEV SFTP Proposal



- Reduce uncontrolled off-cycle and air conditioning effects by applicable percentages
- Air Conditioning HC/CO:
  - Account for CO increase due to A/C loading, based on fuel consumption (roughly 20%); assume no additional enrichment
  - HC benefit = 100%
- Applies only to LDV/LDT1/LDT2 under NLEV